

Comments on Washington's Work Verification Plan

1. (General) Throughout the plan, the State refers to procedures described in the Washington Administrative Code. Please summarize in the plan the relevant information contained in the code.
2. (Section I) Does the State intend to maintain documentation of hours of work in the case file? The plan should make reference to this for each activity. It refers to maintaining documentation for only certain activities.
3. (Pages 3-4, 6, 8) Please define "collateral contact." The State must have written documentation for employment hours, not oral confirmation.
4. (Page 4) For the self-employed, is the method the State uses for determining gross income and expenses the same method it uses to determine eligibility for TANF benefits? If so, the WVP should state this; if not, it should give more detail on how the State determines these figures.
5. (Pages 5, 6, 9) Please describe the method, including any formulas, for determining average weekly hours of participation in projecting hours of employment. This must be based on actual, documented hours, not anticipated or expected hours. Please revise the plan accordingly.
6. (Page 7) Support services and classroom training do not meet the definition of work experience. Several other activities, such as developing a signed agreement and training plans appear more closely to meet the definitions of job readiness. Please limit the services for this activity to those that meet the definition of the activity.
7. (Page 9) Why does Washington include short-term contingent or trial, temporary work as a job search and job readiness assistance activity? Depending on what it consists of, it should count under work experience, subsidized employment, OJT, or unsubsidized employment.
8. (Page 10) Each State should conduct random reviews to verify hours of participation in self-directed job search. The plan should describe how many reviews the State conducts. If the logs or time sheets are incomplete or the State is not able to verify the hours, then it should not report the hours of self-directed job search. If, in the verification process, you discover systemic data validation problems, you should address them in Section IV, Internal Controls.
9. (Page 11) Job Readiness (Rehabilitation) Assistance should be combined with Job Search and Job Readiness (Employment) on page 9, as the durational limits apply to both activities and are not measured separately.
10. (Page 12) As described in the plan, some domestic violence treatment services do not meet the definition of job search and job readiness assistance because they do not constitute direct preparation for work. For example, seeking temporary shelter or obtaining legal advice may be important and necessary actions for a domestic violence victim but is not a job readiness

activity. If there are activities that directly relate to seeking or preparing for employment, you should amend the plan to describe them. Otherwise, you might want to consider granting federally recognized good cause domestic violence waivers if individuals cannot engage in other work activities, since you have adopted the Family Violence Option. This will protect the State from financial penalty if you fail to meet the work participation rate on the basis of granting such waivers.

11. (Page 16) A vocational program may take place at a secondary school, but it may not consist of secondary school training or be part of a secondary school degree. That would count under satisfactory participation in secondary school.
12. (Page 17) How can the State enforce the 12-month lifetime limit on vocational educational training, when, records may be retained for only 30 months, mentioned in describing several other activities?
13. (Page 18) What criteria will the State use to ensure that any basic and remedial education and English as a Second Language (ESL) are a necessary or regular part of the vocational education training?
14. (Page 24) After reviewing State Work Verification Plans, we have decided that more than 10 holidays does not meet the standard we outlined in the preamble to the interim final rule, allowing a reasonable number of holidays. The State is free to designate 10 days of holidays to count toward the participation rate for an individual. We will not approve plans with more than 10 days of holidays. If the State chooses to designate two or more successive days (such as Thanksgiving and the Friday after Thanksgiving) as holidays, they will constitute two of the 10 maximum holidays that it can count for participation. In addition, semester breaks and work shut downs are not considered holidays. If a State fails the participation rate due to a natural disaster or other catastrophe, it can make a request for a reasonable cause exception on that basis.
15. (Pages 24, 25) The plan should make it clear that the excused absence and holiday policies apply only to the hours the individual was scheduled to participate.
16. (Page 25) Please describe the criteria for granting excused absences.
17. (Pages 25-26) When deeming core hours, the State should base the hours of participation on the monthly TANF and food stamp benefits divided by the higher of the Federal or State minimum wage. This result should not be divided by 4.3, as the limit does not apply to any one week, but to total hours for the month (or the average weekly hours). Also, the plan should note that deeming only applies once the individual participates for the maximum hours allowed under the FLSA.
18. (Page 27) The reference to a “caretaker relative” caring for a disabled family member should be changed to “parent.” Also, the plan should define “family member.”

19. (Pages 27-28) Please clarify references to various categories. For example, the plan refers to categories 2-4 but does not explain how they fit into the broader context of determining a work-eligible individual.
20. (Page 30) Please describe how data flows from the work site activity through the data system(s) to ACF including edits/consistency protocols.
21. (Page 30) Please describe the Quality Assurance Process, review scope, sample size, etc.